



Friends of the Clearwater

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August 10, 2020

Eric Lee Vincent, Forester
Supervisor's Office
Nez Perce-Clearwater National Forests
903 3rd Street
Kamiah, ID 83536

Via email: eric.vincent@usda.gov

Mr. Vincent:

Friends of the Clearwater has been attempting to get clarity about the public process for the Forestwide Stand Improvement proposal (your website at: <https://www.fs.usda.gov/project/?project=58299>). We are concerned about the apparent *lack* of public process, actually, and the potential impacts of actions implied with the Forest Service's limited documentation.

My most recent email concerning this was to Forest Service NEPA Planner James Chynoweth (August 4). It stated:

So my reading of this situation is, the NPCNF does not want to conduct "scoping" that involves the public. To only do "internal" scoping but somehow that also involves the Nez Perce Tribe. We have no problem with the Forest Service involving the tribe in scoping--only with the exclusion of the wider public.

36 CFR 220.4(e) is scoping, to be carried out according to 40 CFR 1501.7. Scoping requires the lead agency to:

"Invite the participation of affected Federal, State, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds), unless there is a limited exception under § 1507.3 (c). An agency may give notice in accordance with § 1506.6."

40 CFR 1501.7(a)(1). I am certainly an "interested person." And your document explicitly acknowledges Friends of the Clearwater is an interested party. It appears the NPCNF has unlawfully excluded the public and interested parties.

40 CFR 1506.6, involves duties to "diligently" involve the public.

We ask for notice of this project by both email and mail going forward. You may consider me the FOC contact person for this project, and use jeff@friendsoftheclearwater.org for email.

Since then I've heard nothing from the NPCNF.

Obviously, with something of a "forestwide" scope, FOC is concerned about cumulative effects. How many acres does the FS foresee being "improved" under this proposal? Over how many years will the Forest Service be implementing the actions being contemplated under this proposal? Is this a programmatic action? Has the agency already analyzed cumulative impacts, and if so, where is your analysis? Will the Forest Service be opening up closed or otherwise inaccessible motorized travel routes to access to the stands in question? How will the Forest Service consider the increased risk of fire, given so many small, dead trees to be left in these stands following "improvement"? Will you be initiating any level of consultation or communication with the US Fish & Wildlife Service concerning the Forestwide Stand Improvement proposal? Will the Forest Service be conducting an open scoping process?

Thank you for timely answers to our questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeff Juel".

Jeff Juel

jeff@friendsoftheclearwater.org

509-688-5956

Cc: James Chynoweth, Cheryl Probert